

THE HONORABLE ROBERT J. BRYAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

LAURIE HANNAN,

Plaintiff,

v.

CITY OF TACOMA, DAVID BOBO,
individually and the marital community
thereof with JANE DOE BOBO,
MICHAEL COMBS, individually and
the marital community thereof with
JANE DOE COMBS, and DOES 1-5,
inclusive,

Defendants.

NO. C05-5396 RJB

STIPULATION AND PROTECTIVE
ORDER FOR PERSONNEL
RECORDS

STIPULATION

COME NOW the parties, by and through their attorneys, and stipulate to the entry of a protective order prohibiting the disclosure of certain discovery materials. For the purposes of this stipulation and order, the term “discovery

materials” shall mean the documents and materials identified in paragraph 1 herein, whether produced in response to requests for production, responses to interrogatories, or deposition testimony.

1. It is agreed by the parties that the following discovery materials are the subject of and protected by this Stipulation and Order:

Any and all personnel records relating to any current or former City of Tacoma employee, including, but not limited to, job applications, resumes, performance evaluations, internal or external investigations of said employees, all documents that relate to the manner or method by which said employees performed their job duties, and any other materials typically included in the files and documents for such employees.

2. It is stipulated that the discovery materials described in paragraph 1, *supra*, will only be disclosed to the parties, their attorneys, and persons assisting counsel in the preparation of this litigation, including consulting and trial experts. It is further stipulated that such documents shall be held strictly in confidence and shall not be disclosed to anyone else, by the parties or by their attorneys. It is further stipulated that before being provided access to any documents protected by this order, all persons assisting counsel in the preparation of this litigation shall be shown a copy of this Stipulation and Order and advised that they are bound by its terms.

3. It is stipulated that the discovery materials described in paragraph 1, *supra*, may be used in depositions without the necessity of sealing the documents first and may be shown to persons at deposition, provided there is a need to do so.

4. It is stipulated that, prior to any of the documents described in paragraph 1, *supra*, being filed with the court as an exhibit to a pleading, the offering party shall redact from said documents the following information: the day and month of the employee's date of birth; social security numbers; bank account numbers; home address; and home telephone number.

5. The parties agree that, at the conclusion of the litigation, all copies or reproductions of the discovery materials described herein shall be destroyed.

6. The parties further agree that nothing contained in this Stipulation and Order affects in any way or to any degree the admissibility of any discovery material or any information disclosed under the terms of this Stipulation and Order. The admissibility of such material and information shall be governed by the Federal Rules of Evidence and the Federal Rules of Civil Procedure in the same manner as any other potential evidence in this case.

7. Nothing in this Stipulation and Order shall infringe upon the right of any party to object to providing information which is subject to the attorney-client privilege, or which is non-discoverable on any other legitimate ground.

DATED this 7th day of October, 2005.

ELIZABETH A. PAULI,
City Attorney

LAW OFFICES OF
GRANT & ASSOCIATES

By: s/_____
JEAN P. HOMAN
WSB #27084
Attorney for Defendants

By: s/_____
ARTIS C. GRANT, JR.
WSB #26204
Attorney for Plaintiff

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ORDER

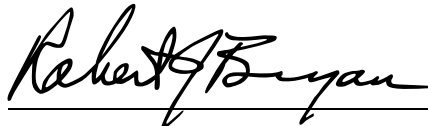
Based upon the above stipulation,

IT IS HEREBY ORDERED that the discovery materials described in the above Stipulation shall not be disclosed to anyone other than the parties, their attorneys or persons assisting counsel in the preparation of this litigation; and it is further

ORDERED that the discovery materials described in the above Stipulation shall be treated in accordance with the terms of the Stipulation; and it is further

ORDERED that all copies of said documents shall be destroyed upon the conclusion of this lawsuit.

DATED this 13th day of October, 2005.



ROBERT J. BRYAN
United States District Court Judge

Presented by:

ELIZABETH A. PAULI, City Attorney

By: _____
JEAN P. HOMAN
WSB #27084
Attorney for Defendants

Approved as to Form:

LAW OFFICES OF GRANT & ASSOCIATES

By: _____
ARTIS C. GRANT, JR.
WSB #26204
Attorney for Plaintiff